

20-mj-899 KMM

STATE OF MINNESOTA

ss. AFFIDAVIT OF TONYA M. PRICE

COUNTY OF RAMSEY

Your affiant, Tonya M. Price, being duly sworn, does depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI"), and have been so employed since December 2008. I currently am assigned to the Special Agent in Charge, St. Paul, Minnesota field office.

2. During my career as a Special Agent, I have conducted numerous document and benefit fraud related investigations, child pornography investigations, and human trafficking investigations; sworn to and executed search and arrest warrants; conducted physical and electronic surveillance; and arrested numerous individuals for violations of federal laws. As a Special Agent with HSI, I have specialized in investigations involving labor and sex trafficking as defined in Title 18, United States Code, Sections 1589, 1590, and 1591. I have been designated by HSI as a subject matter expert in human trafficking cases, have trained local and federal law enforcement across the United States in conducting those investigations, and have provided in-court expert testimony.

3. The facts and information contained in this affidavit are based upon my own investigation and observations and those of other agents and law enforcement officers involved in the investigation. This affidavit contains information necessary to support probable cause for the attached Criminal Complaint and Application for an Arrest Warrant.

It is not intended to include each and every fact and matter observed by me or known to the government.

4. Based on the facts set forth in this affidavit as well as my training and experience, there is probable cause to believe that CHARLES WILLIAM DEXTER III (hereinafter, "DEXTER"), date of birth XX/XX/1980,¹ has committed crimes in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(2) and 1594(c) (Sex Trafficking of a Minor Under the Age of Eighteen).

PROBABLE CAUSE

5. On August 13, 2020, the Bloomington Police Department ("BPD") located an advertisement on the website megapersonals.com advertising sexual acts in the City of Bloomington, Minnesota. The advertisement stated, "Come and have fun with us" and "hi guys looking for fun we are hot young wet and ready very open to non rushed sessions." The advertisement contained three photographs of a female wearing what appeared to be undergarments or revealing sleepwear with a distinctive pattern. The advertisement listed a Minnesota-based phone number to contact in response to the advertisement (XXX-XXX-8507).² During the initial investigation, law enforcement officers identified the phone number listed on the advertisement as belonging to a 14-year-old female who had previous contacts with law enforcement.

¹ I have partially redacted the dates of birth of person(s) listed herein pursuant to local rules. The full dates of birth are known to me and will be made available to the Court on request.

² I have partially redacted the phone numbers listed herein because they could be searched on public websites, which would return advertisements featuring Minor A. The full phone numbers are known to me and will be made available to the Court on request.

6. On August 13, 2020, at approximately 11:15pm, a BPD officer texted the XXX-XXX-8507 phone number listed on the advertisement using a squad phone and placed a call to the phone number to inquire about availability. A female-sounding voice answered the phone and indicated that a half-hour of service with herself and another female would cost \$250.00 and that there was no need to bring condoms as they would be available. Following the phone conversation, the female sent the officer a text message with the hotel location (the Courtyard by Marriott, 4460 78th Street Circle West in Bloomington) and hotel room number (room number 227).

7. While the officers were driving to the provided hotel location, one of the officers texted the phone number listed in the advertisement to request photos of the two females whom the officer was meeting. In response, the officer received two photos—one photo of a female with exposed breasts and one photo of a female wearing what appeared to be undergarments or revealing sleepwear on her hands and knees on a bed, with her back facing the camera. The latter photo was identical to one of the photos posted in the online advertisement. As the officers were nearing the hotel location, they received a phone call from phone number XXX-XXX-8507 and a female-sounding voice asked how far away he was and how much money he had. The officer responded that he was ten minutes away and had \$400.

8. On August 14, 2020, at approximately 12:30am, the officers arrived at the hotel location. When the officers arrived at the hotel, they learned from the hotel front desk staff that the hotel room 227 was rented to Lashonda Marie GROSBUSCH (hereinafter, “GROSBUSCH”), date of birth XX/XX/1982, and was rented from August 11 through

August 14, 2020. Hotel staff advised the officers that, based on the arranged prostitution meeting, they wanted the room occupants evicted. Upon entrance to the hotel room, officers found it unoccupied, with unused condoms lying around the room. The officers later found used condom packages in the trash and female clothing near the television, among other items, pursuant to a search warrant.

9. Meanwhile, as the officers entered the hotel, another officer observed two females briskly leaving the hotel on foot. The officer observed the females on their cell phones and continuously looking over their shoulders. The officer followed the females and located them outside near the hotel in the vicinity of 78 Street West and Johnson Avenue South. The officer asked one of the original responding officers to call the phone number listed in the advertisement (XXX-XXX-8507) and observed that the younger female's cell phone rang and displayed the responding officer's phone number.

10. BPD officers interviewed both females separately outside the hotel. The first female was a minor child aged 14 years old (hereinafter, "Minor A"), who was wearing what appeared to be the same undergarments or revealing sleepwear as the female in the advertisement photo. While speaking with the officer, Minor A was crying heavily and indicated that she had met a man she knew as Charles DEXTER a couple months ago at a bus stop and that DEXTER brought her to the hotel.³ According to Minor A, DEXTER set up the commercial sex act "date" and told her that she would have to give him half of the money.

³ Law enforcement officers later determined that the full name of the individual was Charles William DEXTER III.

Minor A also stated that the night before,⁴ DEXTER coached her on how to talk to the “johns.”⁵ Minor A explained that DEXTER had seen the police arrive at the hotel and told her to get out of the hotel room and to meet across the street from the hotel. Minor A told the officer that she did not know the other female who was in the hotel room with her.

11. Minor A explained that the plan was to have a sex-for-money exchange with the sex buyer (who, unbeknownst to her, was a police officer operating in an undercover capacity), when he arrived at the hotel on the early morning of August 14, 2020. Minor A stated that she believed DEXTER’s friend “Shonda” (believed by law enforcement to be GROSBUSCH) set up the online advertisement. Minor A disclosed to law enforcement that DEXTER had sex with her the morning of August 13, 2020.

12. During the interview, Minor A provided the officers with DEXTER’s phone number (XXX-XXX-9191) and told the officers that DEXTER drives a silver Cadillac passenger vehicle. The number XXX-XXX-9191 was listed in one of the advertisements posted on megapersonals.com on or about August 13, 2020, advertising commercial sex acts with Minor A. A vehicle matching Minor A’s description and registered to DEXTER was located in the hotel parking lot and was towed for evidence. A box of Trojan condoms was observed in plain view on the driver’s seat of the vehicle, as well as a box of Durex condoms between the front passenger seat and the front passenger door.

⁴ Given that it was just after midnight on August 14, it is unclear whether BROOKS meant the night of August 12 or August 13.

⁵ Based on my knowledge and experience, I know the term “johns” to refer to commercial sex buyers.

13. The other female found with Minor A outside the hotel was identified as Ty'lequia La'quell Renea BROOKS (hereinafter, "BROOKS"), date of birth XX/XX/1999. BROOKS also provided a statement to the officers. BROOKS explained that the plan was to have sex with the sex buyer in exchange for money when he arrived at the hotel room. BROOKS admitted that she was the female with exposed breasts in one of the photos sent to the officer on his way to the hotel. BROOKS further explained she was driven to the hotel by "RJ" and "Honey,"⁶ who were to receive a share of the prostitution profits in exchange for providing her and Minor A with protection during the commercial sex dates. In a subsequent interview, BROOKS stated she had met up with DEXTER at his house the night before and then went to the hotel.

14. Later in the day on August 14, 2020, DEXTER called the BPD using phone number XXX-XXX-9191 and left a message regarding his towed vehicle. DEXTER and GROSBUSCH arrived at the BPD to pick up DEXTER's car. The vehicle was not released to DEXTER at that time in order to hold the vehicle to execute a potential search warrant.

15. GROSBUSCH and DEXTER drove away in the vehicle they arrived in, which law enforcement database checks revealed was registered to GROSBUSCH. DEXTER was later apprehended by BPD and was placed under arrest for violating Minnesota Statute § 609.322(a)(4) (engaging in sex trafficking of an individual under the age of 18). GROSBUSCH was stopped by a marked BPD squad car and was arrested for

⁶ BROOKS referred to her drivers as a black male with dreads nicknamed "RJ" driving a Cadillac and a light-skinned female with long black hair nicknamed "Honey." Based on the descriptions, law enforcement believes BROOKS was speaking about DEXTER and GROSBUSCH.

the same offense. The vehicle driven by and registered to GROSBUSCH was searched and towed. During the search of the vehicle, officers located cell phones, hotel paperwork from several hotels and dates of stay, a hotel keycard, numerous other documents, condoms, and a personal sexual pleasure device. In addition, officers located a book that appeared to be a ledger, with notes in it such as "\$6,550.00, 85 customers, 8 ppl=\$600.00."

16. On August 19, 2020, law enforcement officers obtained a search warrant for DEXTER's residence located at 3835 6th Street North, Minneapolis, Minnesota. The warrant was signed by District Court Judge Luis Bartolomei.

17. On August 19, 2020, at approximately 3:00 p.m., officers executed the search warrant for DEXTER's residence. During the search, officers located a black .40 caliber Springfield Armory handgun inside the residence in the main floor bedroom in a top drawer. According to law enforcement database searches, the handgun had been registered as stolen out of Minneapolis. During the search, law enforcement officers also located \$1,201 in cash inside the residence.⁷ Officers also located and seized one Xbox One gaming console, one Samsung S8 smart phone, one Xfinity alarm system monitor, two Vanilla brand debit cards, and one Seagate external hard drive from the residence's main floor living room.

18. On August 15, 2020, law enforcement officers obtained search warrants to search DEXTER's cell phone, a black LG Smartphone, and GROSBUSCH's cell phone,

⁷ Based on my training and experience, I know that individuals who engage in criminal activity often do so for profit. Further, in my training and experience, it is common for sex traffickers and sex buyers to transact in cash.

a black Samsung Galaxy. The warrants were signed by District Court Judge Carolina Lamas.

19. During the search of DEXTER's LG Smartphone cell phone, law enforcement officers located the two photos that were sent to the undercover officer as the officer was driving to the hotel location. The officers also located the photos that were posted to the sexual advertisement on the website megapersonals.com that was identified by law enforcement officers on August 13, 2020. In addition, officers located other photos on DEXTER's phone from other advertisements placed on the website megapersonals.com on August 13, 2020, as well as emails in response to the August 13, 2020 sexual advertisements on megapersonals.com.

20. During the search of GROSBUSCH's Samsung Galaxy cell phone, law enforcement officers located in the web browser two web pages/windows opened for the website megapersonals.com where the suspect advertisements were posted, and one of them contained a note to check GROSBUSCH'S email for the activation link for the new account. Officers also located numerous text messages from unknown numbers dated August 13 and 14, 2020, inquiring about the sexual advertisements, discussing availability and rates, and providing the hotel location.

21. On August 15, 2020, DEXTER willingly and voluntarily agreed to speak with law enforcement officers at the Bloomington Police Department. The officers advised DEXTER of his *Miranda* rights. DEXTER waived his *Miranda* rights and agreed to an interview with law enforcement. During the post-*Miranda* interview, DEXTER admitted to meeting Minor A at some point during the summer of 2020.

22. On August 18, 2020, Minor A participated in a Cornerhouse forensic interview. Minor A described how DEXTER approached her a few months prior at a bus stop about engaging in prostitution activities by phrasing it as “working for him” and said DEXTER asked her if she wanted to make some money. Minor A told DEXTER that she was only 14 years old, but DEXTER responded that it “didn’t matter.” Minor A described three incidents on August 13, 2020, where arrangements were made for strangers to engage in sex acts with her for money. One such incident was an “outcall” at another hotel in Bloomington. DEXTER drove her to the out call. She had sex with a man for approximately 30 minutes in exchange for \$250. The second incident was a “threesome” with a man and BROOKS for 30 minutes in exchange for \$240. The third incident was a 15-minute sexual act with a man in exchange for \$120. Minor A explained that DEXTER took half of the money received.

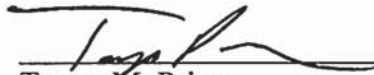
23. During her forensic interview, Minor A also stated that DEXTER would force vaginal sexual intercourse with her, which she estimated happened on approximately five occasions over the course of two months. Minor A described how on one occasion when DEXTER raped her, DEXTER strangled her by putting both of his hands around her neck during. Minor A recalled thinking she was going to die while DEXTER was

strangling her. Minor A described how in response to DEXTER strangling her, she became dizzy and could not breathe. Minor A also stated that as a result, either she or DEXTER poured water on her face for her to feel better. She also indicated that on more than one occasion, DEXTER squeezed her breasts.

24. On August 19, 2020, DEXTER posted bail and was released from jail with an ankle monitoring device. On September 3, 2020, DEXTER cut the device off and fled. DEXTER failed to appear for court as scheduled on September 15, 2020, and has an active warrant for his arrest in Hennepin County.

CONCLUSION

25. Based on the facts set forth above, and based on my training, experience, and knowledge, I respectfully submit that there is probable cause for issuing a Complaint and Arrest Warrant for Charles William DEXTER III, for engaging in sex trafficking of a minor, all in violation of Title 18, United States Code, Sections 1591(a), 1591(b)(2), and 1594(c).



Tonya M. Price
Special Agent, Homeland Security Investigations

SUBSCRIBED and SWORN to before me by reliable electronic means (Zoom and email) pursuant to Fed. R. Crim. P. 41(d)(3) on this 14th day of December 2020.



The Honorable Kate M. Menendez
United States Magistrate Judge